

# Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

1. Date filed: February 11, 2015
2. Name of company(s) covered by this certification: Valley Telephone Cooperative, Inc.
3. Form 499 Filer ID: 807033
4. Name of signatory: Kristi L. Lee
5. Title of signatory: Chief Information Officer
6. Certification:

I, Kristi Lee, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

Kristi L Lee

**Attachments:** Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (if applicable)  
Summary of customer complaints (if applicable)

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Valley Telephone Coop. Inc. (VTC) and its affiliates have established operating procedures that are designed to ensure compliance with the CPNI rules and requirements in Subpart U of Part 64 of the FCC's rules (47 C.F.R. 64.2001 through 64.2009).

VTC has trained and provided to all Customer Service Representatives (CSRs) a CPNI manual, which includes the disciplinary action that will be taken if a CPNI breach occurs. I, as VTC's Compliance Officer, have received signed employee certification forms following the above-mentioned training. Written procedures that comply with CPNI rules have also been distributed to CSRs. VTC provides CPNI updates and training to the appropriate employees every 6 months. Annually, certification forms are updated following training by the Compliance Officer.

VTC has mailed opt-out notices to all customers. If a customer chooses to opt-out, their selection is updated in the billing system. The opt-out status is accessible to all CSRs when accessing CPNI data. VTC's Marketing Department removes customers who have opted-out from applicable marketing efforts. Opt-out notices are mailed annually to all VTC customers.

VTC's customer information is kept on a secure server to prevent unauthorized access by hackers and unauthorized employee access. Authorized employees have unique system logins and passwords which determines the level of customer information they can access.



\_\_\_\_\_  
Company Officer Signature

Kristi L. Lee

\_\_\_\_\_  
Printed Name



\_\_\_\_\_  
Date